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May 15, 2024

**VIA CM ECF**

Hon. Sarah Netburn  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Goldner v. Norris et al.***

Dear Judge Netburn,

Plaintiffs, Marc Goldner, Individually and as Officer of Golden Bell Entertainment, LLC, a California company, and Golden Bell Studios, LLC, Golden Bell Entertainment, LLC, a Nevada company, and Golden Bell Studios, LLC, write this letter motion seeking a brief, 30 day extension of the currently pending deadlines of May 15, 2024 to file a stipulation to dismiss the claims against the Andrews McMeel defendants, and the May 30, 2024 deadline to file a motion for leave to amend the Complaint, if any.


President and Chief Creative Officer of Golden Bell, Rachel Korsen's, mother has been diagnosed with cancer and had surgery recently and is consulting with physicians this week regarding further treatment options, and Ms. Korsen and Mr. Goldner have been taken from their business duties to attend to these life altering concerns. Both Ms. Korsen and Mr. Goldner have been unable to review and assess their counsel's analysis and recommendations regarding their claims as a result of the cancer treatment and related obligations, and have requested a short continuance of the current deadlines to provide them with time to consider their claims and how Plaintiffs will proceed in this matter.

My office has conferred with counsel for the Andrews McMeel defendants, and counsel for Mr. Norris, and both have consented to the extension of time. Given the extenuating circumstances, and the intention to provide Plaintiffs with adequate time to evaluate their claims,

we respectfully request that this Court grant a 30-day extension of time to June 14, 2024, to file a stipulation to dismiss the claims against the Andrews McMeel defendants, and to July 1, 2024, to file a motion for leave to amend, if any. There has been one prior request for an extension of time.

RESPECTFULLY SUBMITTED,  
GERARD FOX LAW P.C.

By:

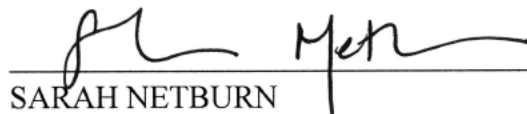


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*Admitted Pro Hac Vice*

The parties shall file a stipulation dismissing all claims against Defendants Andrews McMeel Universal, LLC, and Andrews McMeel Publishing, LLC by June 14, 2024. Plaintiffs may file an amended complaint by July 1, 2024. If Defendant Norris does not consent to the filing of an amended complaint, Plaintiffs shall file a motion to amend by the same date. No further extensions will be granted.

**SO ORDERED.**

  
SARAH NETBURN  
United States Magistrate Judge

Dated: May 17, 2024  
New York, New York